

BRANDY A. SARGENT (SBN 292586)  
K&L GATES LLP  
ONE SW COLUMBIA STREET, SUITE 1900  
Portland, Oregon 97204  
Telephone: 503.226.5735  
Facsimile: 503.248.9085  
Email: brandy.sargent@klgates.com

MICHAEL J. GEARIN (*Admitted Pro Hac Vice*)  
K&L GATES LLP  
925 Fourth Avenue, Suite 2900  
Seattle, Washington 98104  
Telephone: (206) 623-7580  
Email: michael.gearin@klgates.com

Attorneys for Amazon Capital Services, Inc.  
and Amazon.com Services, LLC

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**RIVERSIDE DIVISION**

In re:

OKAYSOU CORPORATION

Debtor

OKAYSOU CORPORATION

Plaintiff

v.

AMAZON.COM SERVICES, LLC  
AMAZON CAPITAL SERVICES, INC.  
ATOMEET CORP.  
FUDONG CAO  
SOXING INFORMATION TECHNOLOGY  
COMPANY (CHONGQING) CO. LTD.

Case No. 6:23-bk-11535-MH

Chapter 7

Adv. Pro. No. 6:23-ap-01122-MH

**AMENDED STIPULATION STAYING  
ADVERSARY PROCEEDING AND  
ASSOCIATED DEADLINES**

**[No hearing required]**

Robert Whitmore, Chapter 7 Trustee (the "Trustee") for Plaintiff Okaysou Corporation  
(the "Debtor") and Defendants Amazon.com Services, LLC and Amazon Capital Services, Inc. (the  
"Amazon Defendants"), hereby enter into this Stipulation to stay the above captioned Adversary  
Proceeding filed by the Debtor's estate against, among others, the Amazon Defendants, pending the

Trustee's investigation of the financial affairs of the Debtor and further negotiations between the Trustee and Amazon Defendants. This Stipulation is based on the following facts.

**RECITALS**

WHEREAS, on March 17, 2023, the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing a chapter 11 case, Case No. 6:23-bk-11535-MH (the "Bankruptcy Case").

WHEREAS, Debtor is engaged in the e-commerce sale of air purifiers and accessories, including on the United States Amazon.com online store (the "Amazon Store"), which is administered by Amazon.com Services, LLC. Proceeds of the Debtor's e-commerce sales to customers on the Amazon Store are deposited into the Debtor's Amazon Seller Account.

WHEREAS, Amazon Capital Services, Inc. loaned the Debtor the principal amount of \$900,000 pursuant to a written loan agreement dated November 27, 2022.

WHEREAS, on December 13, 2023, Debtor filed a Complaint (the "Complaint") against the Amazon Defendants, as well as Atomee Corp., Fudong Cao, and Souxing Information Technology Company (Chongqing) Co. Ltd. (the "Adversary Proceeding")

WHEREAS, on December 28, 2023 the Bankruptcy Court entered an order converting the Bankruptcy Case to a case under chapter 7 of the United States Bankruptcy Code.

WHEREAS, on January 2, 2024, the Trustee was appointed as the Chapter 7 Trustee for the Debtor's estate.

WHEREAS the Trustee is in the process of investigating the Debtor's financial affairs and the facts and circumstances alleged in the Complaint.

WHEREAS, in the interest of reducing expenses of the estate and parties and promoting judicial economy, the Trustee and the Amazon Defendants wish to stay this Adversary Proceeding pending the Trustee's investigation and further negotiations of the parties.

NOW, THEREFORE, the Amazon Defendants, by and through their counsel, and the Trustee hereby stipulate and respectfully request entry of an Order as follows:

1. All proceedings in this Adversary Proceeding, including the deadlines for all defendants to answer or otherwise plead, the parties to conduct conferences pursuant to Federal

Rules of Bankruptcy Procedure 16 and 26, and the parties to make initial disclosures, prepare a discovery plan, and prepare a joint status report shall be stayed until the earlier of (1) either the Trustee or Amazon Defendants successfully moves to re-open proceedings and establish deadlines associated therewith or (2) such other or further time the Court may establish.

2. The status conference schedule for February 14, 2024 shall be continued for a date at least 180 days thereafter.

3. The parties have agreed to the form of Order attached hereto as "Exhibit A" which will be lodged concurrently with the filing of this Stipulation;

4. This Stipulation is without prejudice to, and nothing contained herein constitutes or shall be deemed a waiver (expressly or implicitly) by any party of its claims or defenses in connection with the Adversary Proceeding.

5. This Stipulation may be executed in counterparts, and all such executed counterparts when taken together shall constitute an original of one and the same document. Counterparts may be transmitted by facsimile, electronic mail or other means.

IT IS SO STIPULATED:

Robert Whitmore, Chapter 7 Trustee

Date: January 16, 2024

By:



Robert Whitmore

*Chapter 7 Trustee for the Estate of Okaysou Corporation*

K&L GATES LLP

Date: January 16, 2024

By: /s/ Brandy A. Sargent

Brandy A. Sargent

Michael J. Gearin

*Counsel for Amazon.com Services, LLC and Amazon Capital Services, Inc.*